

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

No. 21-mj-30421

-vs-

Sophia Martini,

Defendant.

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**STIPULATION TO ADJOURN PRELIMINARY EXAM AND FOR  
FINDING OF EXCLUDABLE DELAY UNDER THE SPEEDY TRIAL ACT**

The United States of America and the defendant, by and through its undersigned attorneys, move for an adjournment of the preliminary hearing and an ends-of-justice continuance under the Speedy Trial Act. In support, the parties state as follows:

1. Defendant Sophia Martini made her initial appearances on a complaint on September 1, 2021. She was released on bond, and the preliminary exam was adjourned until December 22, 2021, by stipulation of the parties.
2. The government and the defendant are engaged in pre-indictment plea negotiations, reviewing discovery, and conducting investigations. The parties wish to continue these endeavors through at least February 24, 2022. The parties agree that this constitutes good cause for an adjournment of the preliminary hearing,

taking into account the public interest in the prompt disposition of criminal cases.

*See* Fed. R. Crim. P. 5.1(d).

3. The parties also agree that the ends of justice served by granting an adjournment and excluding the time from calculation for defendant's investigation and plea negotiations outweigh the best interests of the public and the defendant in a speedy trial and that, therefore, the period from December 22, 2021 through February 24, 2022, should be excluded in calculating the time within which an indictment or information must be filed under the Speedy Trial Act, 18 U.S.C. §§ 3161(b), 3161(h)(7). In light of the above, the government submits that there is good cause to adjourn the preliminary hearing.

Respectfully submitted,

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Dated: December 20, 2021

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**ORDER**

This matter coming before the Court on the stipulation of the government and defendant Sophia Martini, for the reasons stated in the stipulation, the Court

(1) finds that the parties have been engaged in and will continue to be engaged in pre-indictment investigations and plea negotiations from December 22, 2021 through February 24, 2022;

(2) finds that this constitutes good cause for the adjournment of the preliminary hearing, taking into account the public interest in the prompt disposition of criminal cases, see Fed. R. Crim. P. 5.1(d);

(3) adjourns the preliminary hearing in this case from December 22, 2021, through February 24, 2022;

(4) finds that the ends of justice served by granting an adjournment and excluding the time from calculation outweigh the best interests of the public and the defendant in a speedy trial under 18 U.S.C. § 3161(h)(7); and

(5) determines that the period from December 22, 2021 through February 24, 2022, should be excluded in calculating the time within which an indictment or information must be filed under the Speedy Trial Act, 18 U.S.C. § 3161(b).

s/David R. Grand  
Hon. David R. Grand  
United States Magistrate Judge

Entered:12/22/21